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6 *Attorneys for Plaintiffs*

7
8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**

10
11 ALEXIS CERNAS, JOHN I.C. DOE, a
minor, by and through his guardian ad
12 litem Maritza Casillas; JANE I.C. DOE,
and, a minor, by and through her
13 guardian ad litem Maritza Casillas; and
BEATRIZ LOERA,

14 Plaintiffs,

15 v.

16 COUNTY OF LOS ANGELES,
17 CARLOS MACIEL, and DOES 1
through 10, inclusive,

18 Defendants.
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Case No. 2:24-cv-03261-SPG-SK
District Judge, Sherilyn Peace Garnett
Magistrate Judge, Steve Kim

**NOTICE OF CONDITIONAL
SETTLEMENT AND REQUEST
FOR ORDER VACATING ALL
DATES**

Proposed Order filed Concurrently

Filed Date: 04/19/24
Trial Date: 01/27/26

20 COME NOW all Plaintiffs and all Defendants (“the Parties”) hereby notify
21 this Court that the Parties have reached a conditional settlement of this entire action.

22 1. The parties attended mediation on August 1, 2025, with mediator Richard
23 Copeland, Esq. Following the mediation, the parties accepted a mediator’s proposal
24 and reached a settlement of the entire action. The material terms of the conditioned
25 agreement were documented by the mediator and executed by the parties.

26 2. The settlement is conditioned upon approval of the Los Angeles County
27 Contract Cities Claims Board and Board of Supervisors, which can take up to and
28

1 including twelve (12) months. The settlement is also conditioned on the Court's
2 approval of petitions to compromise the claims of the two minor plaintiffs.

3 3. If the settlement is approved, then Plaintiffs will file their petition to
4 compromise the claims of the minor plaintiffs after approval of the settlement.
5 Plaintiffs are unable to file their minors' compromise petition prior to approval of the
6 settlement because the interest rates on the proposed annuity may expire in the
7 interim.

8 4. If the settlement is approved, and after approval of the minor's
9 compromise, then the Parties will file a stipulation to dismiss the entire action within
10 ten business days of Plaintiffs' receipt of the settlement funds, including the funding
11 of the minors' annuities.

12 5. Accordingly, the Parties respectfully request that this Court vacate all
13 pending dates and stay all proceedings pending the approval of the settlement.

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15 Respectfully Submitted,

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17 Dated: August 20, 2025

LAW OFFICES OF DALE K. GALIPO

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19 By: /s/ Dale K. Galipo
20 DALE K. GALIPO
21 RENEE MASONSONG.
Attorneys for Plaintiffs

22 Dated: August 20, 2025

CARRILLO LAW FIRM, LLP

23
24 By: /s/ Dominique L. Boubion
25 LUIS A. CARRILLO
26 MICHAEL S. CARRILLO
27 DOMINIQUE L. BOUBION
28 *Attorneys for Plaintiffs*

1 Dated: August 20, 2025

**MANNING & KASS
ELLROD, RAMIREZ, TRESTER LLP**

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3 By: /s/ Lynn Carpenter
4 Eugene P. Ramirez
5 Lynn Carpenter
6 *Attorneys for Defendants*
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Attestation Regarding Electronic Signatures:

I, Dominique L. Boubion, hereby attest that Lynn Carpenter, attorney for Defendants COUNTY OF LOS ANGELES and CARLOS MACIEL, and Dale K. Galipo, co-counsel for all Plaintiffs, concurs in the filing's content and authorized the filing of same.